

Plains Radio through their Tower, KPRN, on their chat room site at <http://www.plainsradio.com> and by mass mailings of e-mails from Bar H.

111. The Defendants Hale behaviors intensified. Mr. Hale through Bar H Farms sent the following e-mail to one of Adams website moderators on her website located at <http://countryfirst.bravehost.com> regarding Adams website:

"From: "Ed Hale" barhfarms@gmail.com
Date: 8/26/2008 12:31:35 AM
To: "jeff justjeff" greybeard411@yahoo.com"

"I hope you don't need much sleep cause your forum is going to be attacked 24 hours a day. I was just sent a e-mail telling me that. Hope you and Momma E have a great timewith your new forum and radio show. It will not last 2 weeks from what I have been told. so have a great day. Enjoy your backstabbing while you can. Ed"

112. On August 21, 2008 Berg filed the first lawsuit against Barry Soetoro a/k/a Barack H. Obama. At this time, Linda referred Berg to her friend, Geoffrey Staples to set up and maintain a website for the lawsuit.¹⁵

113. During this same time, Mr. & Mrs. Hale requested the appearance of Philip J. Berg on their radio show, Plains Radio through their tower KPRN. Berg was the first attorney who field suit against Barry Soetoro a/k/a Barack Hussein Obama regarding his citizenship issues. Berg agreed to appear several times.

114. Berg's office than received calls regarding donations that Mr. Hale was seeking on behalf of Berg. The callers were concerned and wanted verification that Mr. Hale was in fact authorized to seek donations on behalf of Berg. The callers were notified that Mr. Hale was never authorized by Berg or his law firm to accept donations on his behalf.

¹⁵ Geoffrey Staples created the website for Berg www.obamacrimes.com

115. When Berg would no longer attend Mr. Hale's shows and refused communications with him, Mr. and Mrs. Hale became extremely angry. Mr. and Mrs. Hale through Plains Radio, KPRN began making horrible slanderous statements against Plaintiffs, Adams and Berg.

116. Defendants' behaviors continued and Adams continued receiving nasty e-mails from Mr. Hale at Bar H Farms. Although, Plaintiffs have a stack of the abusive, threatening and nasty e-mails, only a few are posted herein for this Honorable Court's review:

-----Original Message-----

From: Ed Hale
Date: 1/1/2009 5:47:42 PM
To: Evelyn/MommaE
Subject: why"

"Why in the hell are you stealing my host and telling lies about me. I am about to come down on you like stink on shit. This is bullshit. I will have attorney on your butt tomorrow. You have gone to far this time old lady. You have nothing but a pissant radio show and maybe a 25 listener if your lucky. You say the same old shit day after day. No good guest will come on your show. You get lairs like Sammy from API and that crook Phil Berg on your show. Then you beg for money for them and get people to give to something that an't worth a damn. I will see you in court. Ed"

-----Original Message-----

From: Ed Hale
Date: 1/4/2009 1:35:08 AM
To: Evelyn/MommaE
Subject: yoru in for it now"

"hey bitch: I can prove that those document you have on your web site that you and berg have had for month is not true. They are my document and you remove plains radio off o them. I am going trash you and Berg Monday night on my show. Your nothing but a fucking crook bitch and now I got you. I put secret codes in those document and that code is in your. You such a low life fucking good for nothing bitch. I am going to sue you fucking whore. those document were copyright protected and now I have you and you son of bitches. Ed"

-----Original Message-----

From: xxxxxx (name removed for protection)

Date: 1/3/2009 5:57:05 PM

To: mammaE

Subject: Ed Hale mouthing

attachment:¹⁶

117. Mr. and Mrs. Hale on their radio programs on Plains Radio through their tower, KPRN, stated Berg was a crook, he was conning and scamming people. Mr. Hale was cussing Berg, calling him a shyster and falsely claiming Berg had lied that he in fact had the Kenyan Birth Certificate of Barack H. Obama because he (Mr. Hale) had obtained it for him, that Berg's law license was going to be taken away, etc., all the time knowing these statements were false. Mr. and Mrs. Hale and others on their behalf also sent out this false information across the internet and through mass mailings from Bar H.

118. At the same time Mr. and Mrs. Hale through their radio program, Plains Radio and their tower, KPRN, began calling Adams heinous names including but not limited to "Bitch," "Whore," "Worthless Piece of Shit," "a Fraud," "a Liar," a "Thief," etc. These remarks were broadcast through KPRN AM 1610 in Wellington, Texas, through talkstreamlive.com, posted on Hale's internet website blogs and sent out by Hale's via the internet by mass mailing through Bar H.

119. Mr. and Mrs. Hale used their radio show, Plains Radio, through talkstreamlive.com, the internet, and KPRN AM 1610 encouraging many individuals to call into Adams radio shows and tell Adams how stupid she was and what a liar she was. Mr. & Mrs. Hale gave out Mrs. Adams Radio show internet website. Mr. & Mrs. Hale went further and encouraged individuals to obtain the call in number from

¹⁶ This chat was taken from Defendants, Mr. and Mrs. Hale and Plains Radio website at plainsradio.com at which time was an open public area and is about Plaintiff, Philip J. Berg, Esquire

Adams radio show so they are able to call into the show and harass Adams, which they did.

120. Mr. and Mrs. Hale through Plains Radio and KPRN had listeners and staffs publish Mrs. Adams home address and telephone number on the internet, which resulted in Mrs. Adams receiving threatening, harassing and degrading phone calls at all hours of the day and night stating Mrs. Adams “should stop trashing Ed Hale and leave Ed Hale alone.” Defendants, Mr. and Mrs. Hale were well aware Adams has never harassed or trashed them.

121. Mr. and Mrs. Hale have repeatedly used their radio show through talkstreamlive.com, the internet, and KPRN AM 1610 giving false statements regarding Mrs. Adams which includes but is not limited to her radio shows; falsely accusing Adams of “trashing” them; falsely accusing Adams of stealing written documents, being the “Obama” divorce papers; falsely accusing Adams of defrauding the State of California for her disability, etc.

122. Mr. and Mrs. Hale have used their radio show through talkstreamlive.com, the internet, and KPRN AM 1610, to post on their internet website blog and sent mass e-mailings from Bar H falsely accusing Adams of “stealing” their “Obama” divorce records. Mr. and Mrs. Hale falsely claim they have their copy of the “Obama” divorce papers copyrighted when in fact Adams had possession of the said records prior to Mr. and Mrs. Hale’s receipt of said divorce papers, which they were well aware of.

123. Mr. and Mrs. Hale have used their radio show through talkstreamlive.com, the internet, and KPRN AM 1610, to advise they have posted on their internet website blog and sent mass e-mailings through Bar H falsely accusing Adams of having a

criminal record; and falsely claiming Adams has a history of lying and stealing. Mr. and Mrs. Hale also falsely claimed that Adams hides who she is on her radio shows; Mr. Hale even went as far as making the open threat, “your day is coming you piece of shit,” referring to Adams. In furtherance of this, Mr. Hale attached an unknown and unidentified printout of a woman by the name of Evelyn A. Adams with a date of birth of November 9, 1937, whom he was aware, was a completely different person.

124. Unfortunately, this did not stop the Defendants Hale. Once the Defendants were served with the Cease and Desist, which was on February 2, 2009, Mr. and Mrs. Hale immediately, just to name a few, posted on their radio show webpage at plainsradio.com and on their radio program, Plains Radio through KPRN the following:

Ed Hale
IP: 75.91.201.231
Feb 2, 09 - 3:33 PM

“Phil Berg is going to sue me”

“Phil Berg has send us a letter stating that if we do not0 retract everything that we said about him, he will sue us. Ok Mr Berg, I retact all the lies I said about you. Hope this makes you happy and now I will continue to tell the truth about you. In my opinion, you have not won any case in court because you don't have any evidence to back up what your case is about. You just grab something out of the air and try to make it look good so people will donate more money to you. I was on your web site the other day and you were asking people to donate \$50 or get 5 of their friend to donate \$10 each. Mr. Berg, we raised \$10,000 for Steve Pidgeon and he still has money to use. How many \$1000's have you received and what did you do with that money? Have you published a report about where you spent their money? Why will you not tell the people who donate to you what is going on with your cases? Why did you send Oprah a letter? Was this a way to raise more money? The courts has turned down you cases as fast as you file them. Wonder why that is so Mr Berg? Mr. Berg, I will give you the entire 4 hours this Friday night to come on my show and answer these question and others. The problem is you will not do it because you know I will ask the hard question. This is your chance to set the record straight. You will have 1000's of people listening and here is your chance to make your case to them, teh American people. If you think

I have not told the truth about you, then come on the air and prove me wrong. Now Mr. Berg, you have the ball, what are you going to do with it? I will bet anyone a \$100 to a dollar you will not show up. Ed Hale”¹⁷

Ed Hale

IP: 75.91.201.231

Feb 2, 09 – 8:04 PM

“I jsut recieved a copy of the letter”

“Yes it appears that Mr Berg is now licenced in the state of Oklahoma also. He is going to sue me for Momma E. Momma E does not like beign told that she is a lair and a thief. All she has to do is prove that she has a set of the orginal 1964 Obama divorce documents and I will retract all of it. I can tell you this much we will find out who is laying about this. Anyway stay tune it is going to get jucier.”¹⁸

“Re: Ed Hale "Phil Berg is Going to Sue Me"

“She's 72 years old...alright... That picture she's got up there makes her look like a beautiful young chick...I got news for you. She's fat, ugly, grey-headed, and she has to use a walker to get around. And, you know something? She's gonna be meetin' her maker real soon. I'm tellin' you that. [sound effect of some kind of gun being cocked and shot.] Bitch! Ed Hale.”¹⁹

125. In or about March 2009 Mr. and Mrs. Hale through Plains Radio filed a false lawsuit against Adams. To further perpetrate their fraud and for further harassment, Mr. and Mrs. Hale and Plains Radio did not have Adams served correctly and only served her with the Collingsworth County Small Claims Citation.

126. As a result, Adams had to hire Berg to respond to the Defendants frivolous small claims lawsuit. Liberi from Berg's Office called the Collingsworth County Small Claims Court and informed them Adams was not served with any type of Complaint.

¹⁷ This was posted on February 2, 2009 at 3:33 p.m. on Defendants website, plainsradio.com blog forum at <http://pub29.bravenet.com/forum/2442810129/show/972859> - Page URL 2/2/2009ate

¹⁸ Posted February 2, 2009 at 8:04 a.m. at Plains Radio Network, Inc. at <http://pub29.bravenet.com/forum/2442810129#bn-forum-1-1-2442810129/8>. Plaintiffs' counsel maintains a copy of this posting.

¹⁹ Posted on the internet February 2, 2009 at 9:06 p.m. Mr. Hale also stated this on his radio program; Plaintiffs counsel has a copy of the audio file.

The Justice read the Complaint on file and stated Mr. and Mrs. Hale through Plains Radio claimed Adams stole their copyrighted "Obama" Divorce papers. Berg responded to the Defendants frivolous lawsuit, supplied the Collingsworth County Court with copies of the "Obama" divorce papers which were given to Adams.

127. Liberi, assistant to Philip J. Berg, Esquire, sent Ms. Adams a copy of the Obama v. Obama, Hawaii D. No. 57972, Divorce Decree in the early morning of January 2, 2009, which Berg's Law Firm received from their Hawaiian Private Investigator via e-mail and Federal Express.
128. Adams posted said divorce papers on her website, Country First, on January 2, 2009 at approximately 4:37 p.m. Eastern Standard Time, 3:37 Central Standard Time.
129. Ed Hale, owner and operator of Plains Radio Network, obviously obtained copies of the same Obama v. Obama divorce decree from Hawaii. However, Mr. Hale through Plains Radio Network did not receive the said divorce decree until January 2, 2009 at approximately 2:25 p.m. Central Standard Time and did not post said divorce papers until approximately 8:00 p.m. Central Standard Time, by his own admission.
130. Mr. and Mrs. Hale were very unhappy with the fact Berg responded on behalf of Adams to his frivolous lawsuit. Mr. and Mrs. Hale then prepared a letter, which they claimed they sent to the Justice of the Peace of Collingsworth County stating it is a fact Berg and Adams conspired to raise money for Berg; it is a fact that Berg is not licensed to practice law within the state of Texas; Liberi's e-mail sent to Adams with the "Obama" divorce papers was a forgery; Liberi's e-mail was doctored; Berg and Adams have partnered together and has collected thousands of dollars from people based on lawsuits that had no chance of success; Berg has been proven to be a shyster; Berg is under investigation by several Federal agencies; Berg and Adams

have conned thousands of Americans out of hundreds of thousands of dollars, etc. This very letter was never sent to Judge Henard, Justice of the Peace of the Collingsworth County Court, Precinct One, Number One, instead Mr. and Mrs. Hale posted it on their radio show website, plainsradio.com and sent it out in mass e-mailing from Bar H which was nothing more than further slander and libel.

131. Mr. Hale continued his above behaviors and began sending harassing e-mails to Liberi. In one of his e-mails, Mr. Hale went as far and threatened Liberi and Berg stating, ***"You and berg are going to regret getting into this"*** [sic]²⁰.

132. Mr. and Mrs. Hale then went onto their website, plainsradio.com through Plains Radio and posted a statement in their open forum stating the following:

"Berg and Adams is under investigation !!!!"

"I have been informed that Phil Berg and Evelyn Adams are under investigation by the Federal Trade Commission and the FBI for conning thousands of Americans out hundred of thousand of dollars. Adams used her radio show to promote Berg lawsuits and asked for and received money. These lawsuit were all dismissed. According to my source, Berg had declared bankruptcy in July. He use this money to pay his personal debts. The money was never used to fund the lawsuits as was promoted by Adams and Berg. Berg has used thousands of dollar for his nightclub drinking binge, throwing money around like a big shot. I have been told to expect Berg to be arrested within a the next few days or weeks as the case is nearing a end. Adams is also going to be charged under the Ricco act as they conspired to defraud the American people out of hundreds of thousand of dollars. This could not happen to 2 more deserving people."²¹

133. The above post was placed on an open forum for the internet world to see. This posting was also carried over to another website, unassociated with the Defendants at

²⁰ E-mail sent from Defendant Edgar (Ed Hale) on April 1, 2009 at 10:42 a.m. from ed@barhfarms.net to Berg's assistant at LisaLiberi@gmail.com

²¹ Posted March 31, 2009 at 2:58 a.m. at Plains Radio Network, Inc. at <http://pub29.bravenet.com/forum/2442810129#bn-forum-1-1-2442810129/8>. Plaintiffs' counsel maintains a copy of this posting.

<http://politijab.com/phpBB3/index.php>. None of which is true and was done maliciously by Mr. Hale.

134. On April 14, 2009, Plaintiffs receive a copy of a mass e-mailing and a falsified statement, sent out by the Defendants Hale and posted on the Defendants Hale websites further slandering Liberi. The e-mails and postings, just to name a few, stated:

Date: Apr 14, 2009 7:32 AM
Subject: Seen Ed Hale's Latest vs YOU
To: lisaliberi@gmail.com

Hi Lisa.....seen this from Ed Hale's page:

Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)

It appears that Lisa Liberi, who works for Phil Berg has been stealing from Dr Orly. Tonight, 2 of our listeners have came forward with recipet from paypay where they thought that they were donating to Dr Orly and instead it went to this Lisa Liberi. At this point, we do not know if Phil Berg is involued, but as my mother has stated "birds of a feather flock together". These are e-mails that I received from Dr Orly. As I have said many times, Phil Berg was in this for nothing but money and also those who helped him also. I can assure you that we have proof that Lisa Liberi did in fact take money that was to go to Dr Orly. That whole bunch that has accused me of stealing is now actually proved that they themselves are thieves

Postings on Plains Radio:

<http://pub29.bravenet.com/forum/2442810129#bn-forum-1-1-2442810129/8/1007326/show>

Ed Hale

QuoteReply

Apr 13, 2009
- 11:46PM

Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)

It appears that Lisa Liberi, who works for Phil Berg has been stealing from Dr Orly. Tonight, 2 of our listeners have come forward with recipet from paypay where they thought that they were donating to Dr Orly and instead it went to this Lisa Liberi. At this point, we do not know if Phil Berg is involued, but as my mother has stated "birds of a feather flock together". These are e-mails that I recieved from Dr Orly. As I have said many times, Phil Berg was in this for nothing but money and also those who helped him also. I can assure you that we have proof that Lisa Liberi did in fact take money that was to go to Dr Orly. That whole bunch that has accused me of stealing is now actually proved that they themselves are thieves.

From: Orly Taitz

Subject: Ceize and Desist, demand to file a joint FBI complaint

To: "Phil J Berg Esq (pvt)"

Cc: "Orly Taitz"

Date: Sunday, April 12, 2009, 10:01 AM

04.12.09.

Mr. Phillip Berg,

this is to inform you that a few days ago I have forwarded my quo warranto pleadings to Mr. John Hemenway, since he agreed to be my local co-counsel in Washington DC. This was a confidential communication and Mr. Hemenway stated, that mistakenly he has forwarded those pleadings to you. Shortly thereafter you have sent a press release, stating that you will be filing Quo Warranto action. This is a Ceize and Desist letter, demanding that you do not use my pleadings and confidential information in any way, shape or form, as you received those in error without my authorization.

Additionally, I received information from a licensed Private investigator, with 20 years of experience with Scotland Yard and 12 years of experience in US, that your paralegal Lisa Liberi has an extensive criminal record, involving fraud, forgery of documents and identity theft. See attached file. I also received information that her husband, who is currently on parole, is an owner of 2 of accounts, accepting credit cards on your charitable foundation web site. As an officer of the court I am obligated to forward this information to the authorities: FBI, Attorney General of California and San Bernardino County Distict Attorney, since Lisa Liberi had a 8 year conviction in San Bernardino County, California. I believe that you, as an officer of the court, as well and a former Assitant Attorney General of Pennsylvania, should join me in issuing a joint complaint and demand for investigation from the above listed authorities.

Dr. Orly Taitz Esq

*26302 La Paz ste 211
Mission Viejo Ca 92691*

Lisa Ostella

Defend Our Freedoms Foundation

<http://defendourfreedoms.org>

Peace through Strength

<http://www.barofintegrity.com>

> From: nsankey@thesankeyfirm.com

> To: lisaostella@hotmail.com; dr_taitz@yahoo.com

> Subject: FW: >>>>>>>>Urgent IMPORTANT INFO SAME SUBJECT<<<<<

> Date: Mon, 16 Mar 2009 14:57:13 -0700

>

> PLEASE NOTE THE LAST LINE!

>

> Thursday, April 10, 2008

New Mexico Woman Sentenced in Identity Theft and Real Estate Fraud

>

>

> Lisa Liberi, aka Lisa Richardson, 42, New Mexico, was sentenced in

> connection with felony charges involving identity theft and forged

> documents. Liberi appeared in San Bernardino County, Rancho Cucamonga,

> Superior Court, on March 21, 2008. She was sentenced to a state prison term

> of 8 years, imposed but stayed, and placed on supervised probation for 3

> years as part of a plea agreement. Liberi was sentenced on ten felony

> counts ranging from Grand Theft, Forgery, and Filing False Documents.

>

> From 2000 to 2004, Liberi engaged in a complex fraud involving falsification

> of police reports, manipulation of credit bureau reports, loan fraud, and

> counterfeiting of court documents resulting in hundreds of thousands of

> dollars in losses to banks and credit unions.

>

> In 2002, San Bernardino County Sheriff's Department personnel arrested
> Liberi on theft by false pretense charges. In July 2004, Investigators from
> the San Bernardino County District Attorney's Real Estate Fraud Unit
> arrested Liberi at the Ontario International Airport for additional felony
> charges while she was out on bail.
>
> She has an extensive criminal record going back to the 90's.

From: John D. Hemenway
Subject: FW: Writ
To: dr_taitz@yahoo.com
Date: Sunday, April 12, 2009, 11:03 AM

April 12, 2009

Dear Orly,

This would indicate that Lisa Liberi received your Writ. It is not specified and she does not say so and it could refer to the earlier Writ she said was written by a former inmate, but I do not think so.
Best regards, JDH

From: Lisa Liberi [mailto:lisaliberi@gmail.com]
Sent: Friday, April 10, 2009 1:07 AM
To: John D. Hemenway
Subject: Writ

John,

There are many problems with this Writ of Quo Warranto. A Writ of Quo Warranto is used when a Government office has been usurped. Furthermore, you cannot go after a person as a Plaintiff using Federal Criminal Codes. You can mention them, however, you can't go after the individual unless you are a prosecutor.

Lisa

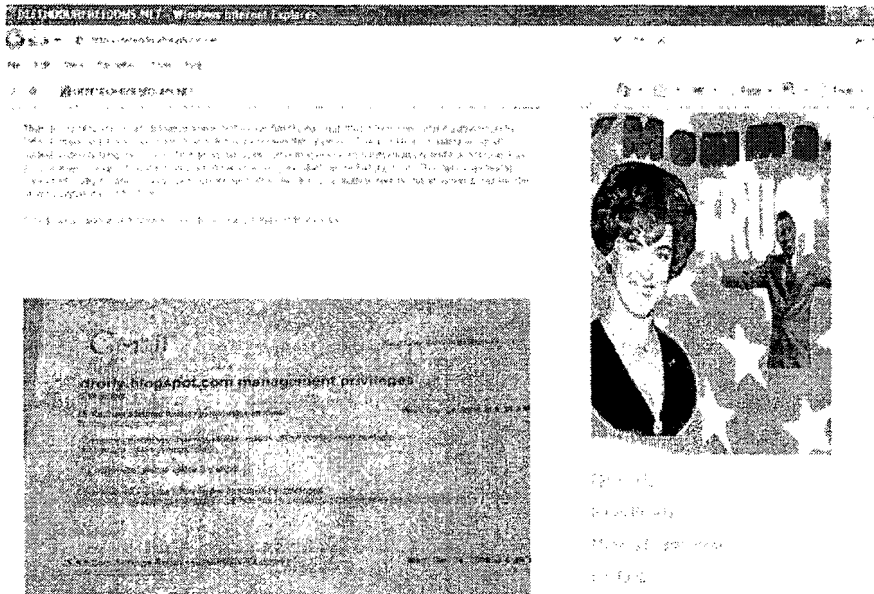
--
Lisa Liberi
Assistant to Philip J. Berg
LAW OFFICES OF PHILIP J. BERG
State: Texas

Ed Hale

QuoteReply

Proof that noly is Lisa involved but more
Hi folks: Look at this page from one of the web sites that Lisa has set up and see who is her partners in this. Get ready for a shock on the right hand side.

Apr 14, 2009
- 1:17AM



State: Texas

TollandRCR

QuoteReply

Re: Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)
 Before you go too far with this, you might want to listen to a recording of your interview with Orly Taitz. It is widely available on the Internet if you don't have a copy.

Apr 14, 2009
 - 10:06AM

In it, Orly seems to clearly state that she believes that the donations are going to Lisa Ostella, her former Webmaster. It is often difficult to understand her speech, so that might be the root of the problem.

The donations being routed via Ostella might make some technical sense, depending upon how Orly set things up. Ostella was a volunteer for her and evidently has Web skills that Orly does not.

Orly does not accuse Lisa Liberì (Berg's associate) of this. Your posting of this claim is widely replicated on the Web, so it is getting quite a bit of exposure. That may be the last thing that you want.

You also might want to note that there are many Lisa Liberì's in the U.S. The one with the criminal history is almost certainly not Berg's associate.

Without commenting on Orly's charges against Lisa Ostella, I would note that it is likely that, with Orly's help, you have just gotten yourself into a real legal pickle. Beyond defamation, when did you start believing people who tell you that they have learned something from an anonymous source?

It looks to me as if those few who are still questioning Obama's eligibility to serve as President are now engaged in a mutually destructive war. This was predictable, because this is always what happens with extremists, particularly those who are remarkably capable of denying reality. It's nice to see it happen.

State: CT

Molly
 Pitcher

QuoteReply

Re: Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)
 TolandRCR,

Apr 14, 2009
 - 10:47AM

I have plenty of proof about Obama's fraud. His forged COLBs, his forged Selective Service Registration, his Intelligence appointees employee getting into Obama's passport records to alter them.

We are not extremists as you say..

I don't know about the reported "theft" but I hope it is not true.

State: ca

kukaniloko

QuoteReply

Re: Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)

Why is it no suprise that all the birfers are now fighting amoung themselves? It would be prudent at this juncture if you can all arrange a team building exercise - go Big Foot Hunting together or something. Maybe at your 10 year reunion, you all can make a field trip to the Obama Presidential Library.

State: Denial

Apr 14, 2009
- 12:42PM

Index

135. As you can see from the above posts, Orly Taitz was accusing Lisa Ostella of hacking and stealing from her PayPal account, not Berg's assistant, Lisa Liberi. Mr. Hale aired the show where Taitz was accusing Lisa Ostella. However, as stated above, Mr. Hale threatened Berg and his assistant that they would regret getting involved in the matter regarding Adams. Mr. Hale's statements above were statements to damage Berg, his assistant and his law practice, knowing the entire time they were falsified statements. Mr. Hale obviously carried out his threat to Berg's assistant.

136. On April 20, 2009, Mr. Hale had a radio show on at 9:00 p.m. Mr. Hale's Guest was Orly Taitz. Mr. Hale then went on falsely stating Lisa Ostella and Lisa Liberi were one and the same person and she was a criminal, knowing the information to be false.

IX. FACTUAL ALLEGATIONS RELATING TO ALL DEFENDANTS

137. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.

138. Plaintiffs are in possession of the Plains radio shows with the above information as well as copies of the postings on the internet placed by Defendants Taitz, Defendant our Freedoms Foundation, Inc., Sankey, from the Sankey Firm and Sankey Investigations, Inc., James Sundquist, Rock Salt Publishing, Mr. & Mrs. Hale, Plains Radio, Bar H Farms and Linda and e-mails which were sent.

139. The illegal acts of Defendants' Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc., Taitz, Defend our Freedoms Foundation, Inc., and Yosef were all commenced under the laws of California and followed through against Liberi in the State of California.
140. Defendants are and have been well aware their statements about Liberi, Berg, the Law offices of Philip J. Berg, Adams and Ostella are falsified. The Defendants will stop at nothing to destroy all Plaintiffs. Plaintiffs' counsel is in possession of all the audio files of Taitz, Mr. and Mrs. Hale, Plains Radio, KPRN, and Bar H Farms and all radio shows they have done broadcastings further slandering the Plaintiffs.
141. Defendants' disclosure, posting on the internet, emailing, etc. of Plaintiffs' personal identifying information including but not limited to social security numbers, names, address, and date of birth Defendants actions also violated and were done in violation of State and Federal Laws, e.g. the Social Security Act; California Privacy Laws, Civil Code §1798 et sequitur; Identity Theft and Assumption Deterrence Act, 18 U.S.C. §1028(a)(7); Pennsylvania Privacy Acts (74 Pa. Stat. Ann. § 201 (West 2006); California Business and Professions Code 22577(a); the Electronic Communications Privacy Act, 18 U.S.C. §§2510-22, and the Stored Communications Act, 18 U.S.C. §§2701-11; Cyber harassment, Cyber stalking, etc. in violation of the Women's Violence Act, Department of Justice Reauthorization Act of 2005, H.R. 3402, titled "Preventing Cyber stalking" and numbered as § 113, §113(a)(3) provides that Section 223(a)(1)(C) applies to "any device or software that can be used to originate telecommunications or other types of communications that are transmitted, in whole or in part, by the Internet; Cyber-stalking and Cyber-harassment laws in violation of the Communications Act, 47 U.S.C. § 223(a)(1)(C) and § 223(h)(1)(B).

142. Defendants DOES 1 through 200 are Defendants internet providers, phone companies, e-mail providers, streamlines, etc. who have allowed Taitz, Defend our Freedoms Foundations, Inc., Neil Sankey with the Sankey Firm and Sankey Investigations, Inc., James Sundquist, Rock Salt Publishing, Plains Radio, Mr. and Mrs. Hale, Bar H Farms, and Linda to continue their illegal and dangerous behaviors against Plaintiffs. DOES 1-200 also represent all unknown unnamed Defendants.

143. For the above-mentioned reasons, Plaintiffs herein are seeking immediate injunctive relief and damages for the injuries caused by the Defendants illegal behaviors.

COUNT ONE

**VIOLATION OF THE FIRST AND FOURTEENTH AMENDMENT
OF THE UNITED STATES CONSTITUTION and ILLEGAL DISCLOSURE
OF AN INDIVIDUAL'S SOCIAL SECURITY NUMBER AND
PERSONAL IDENTIFYING INFORMATION**

(Liberi v. Taitz, Defend our Freedoms Foundation, Inc., Sankey,
the Sankey Firm and Sankey Investigations, Inc.)

144. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.

145. Defendants Taitz, Defend our Freedoms Foundation, Inc., Sankey, the Sankey Firm and Sankey Investigations, Inc., violated Liberi's right to privacy, right of publicity, harassment, endangerment and publication of private facts.

146. Taitz had threatened to destroy Liberi and took every step to ensure she not only destroyed Liberi but harmed and injured her in the process.

147. Taitz sought Liberi's Social Security number and personal identifying information without a permissible purpose from Sankey with the Sankey Firm and Sankey Investigations, Inc., information Taitz was not entitled too. Taitz had been spreading

false criminal information about Liberi over the internet, on radio shows and through mass e-mailing all of which was done through her law firm. Taitz published Liberi's Social Security number, date of birth, where she resided, false information about Liberi's husband; false criminal information through mass e-mailing requesting everyone to post the information on their website. Taitz's e-mails and postings went out to over Two Hundred and Fifty Thousand [250,000] people, all of which was done through her law firm (business) with malice.

148. Sankey through the Sankey Firm and Sankey Investigations, Inc. obtained information from a third party. Without verifying said information and at the request of Taitz, Sankey through the Sankey Firm and Sankey Investigations, Inc. obtained Liberi's Social Security number, without a permissible purpose.

149. Sankey through the Sankey Firm and Sankey Investigations, Inc. illegally e-mailed Liberi's Social Security number, date of birth, where she resided and description and e-mailed it to Taitz and a Reporter with World Net Daily. Sankey through the Sankey Firm and Sankey Investigations, Inc. was well aware the information would be posted on the internet and sent out by mass e-mailing. All of these actions were done through Sankey's businesses and was done with malice to injure and harm Liberi.

150. Liberi had a confidential address as a result of her child and her being victims of domestic violence. The publication of Liberi's personal identifying information by Taitz, Defend our Freedoms Foundation, Inc., Sankey, the Sankey Firm and Sankey Investigations, Inc. made sure anyone with internet had access to Liberi's Social Security number, date of birth and where she resided, further placing Liberi, her son and husband in further danger.

151. In so doing, Taitz, Sankey, the Sankey Firm and Sankey Investigations, Inc. violated California Civil Code §1798.85 which states in pertinent part:

“(a) Except as provided in this section, a person or entity may not do any of the following: (1) Publicly post or publicly display in any manner an individual’s social security number. "Publicly post" or "publicly display" means to intentionally communicate or otherwise make available to the general public.”

152. If there had been a permissible purpose for Sankey through the Sankey Firm and Sankey Investigation, Inc. to disclose Liberi’s confidential information including full name, date of birth and Social Security number, which there was not, Sankey through the Sankey Firm and Sankey Investigations, Inc. violated California Civil Code §1798.81.5 (c) by not ensuring Liberi’s private, personal and confidential information was not maintained pursuant to the privacy laws and not maliciously disseminated via the internet and mass e-mailing. California Civil Code § 1798.81.5(c) states in pertinent part:

“A business that discloses personal information...pursuant to a contract with a nonaffiliated third party shall require by contract that the third party implement and maintain reasonable security procedures and practices appropriate to the nature of the information, to protect the personal information from unauthorized access, destruction, use, modification, or disclosure.”

153. Taitz hired Neil Sankey, The Sankey Firm and Sankey Investigations, Inc. to illegally obtain Liberi’s private and personal information, which Sankey through his investigation firms, the Sankey Firm and Sankey Investigations, Inc. did. Thus, they had a contract for work to be provided.

154. Taitz had a special “tracking” and “hacking” software on her websites and blogs that attached a remote access on Liberi’s computer. Yosef assisted Taitz in entering

Liberi's computer, invading her privacy and taking documents which did not belong to them.

155. California Civil Code §1798.84 states in pertinent part (b) states a party injured for violation of this title injured by a violation of this title may institute a civil action to recover damages and...(c) dictates a civil penalty over and above actual damages and punitive damages for a willful, intentional, or reckless violation...may recover a civil penalty not to exceed three thousand dollars (\$3,000) per violation...(e) Any business that violates, proposes to violate, or has violated this title may be enjoined...(f) A prevailing plaintiff in any action commenced shall also be entitled to recover his or her reasonable attorney's fees and costs...(g) The rights and remedies available under this section are cumulative to each other and to any other rights and remedies available under law.

156. Taitz Sankey, the Sankey Firm and Sankey Investigations, Inc. violated the California privacy laws in excess One Hundred Forty-Four Thousand [140,000] times.

157. Defendants' disclosure, posting on the internet, emailing, etc. of Plaintiffs' personal identifying information including but not limited to social security numbers, names, address, and date of birth Defendants actions also violated and were done in violation of State and Federal Laws, e.g. the Social Security Act; California Privacy Laws, Civil Code §1798 et sequitur; Identity Theft and Assumption Deterrence Act, 18 U.S.C. §1028(a)(7); Pennsylvania Privacy Acts (74 Pa. Stat. Ann. § 201 (West 2006); California Business and Professions Code 22577(a); the Electronic Communications Privacy Act, 18 U.S.C. §§2510-22, and the Stored Communications Act, 18 U.S.C. §§2701-11; Cyber harassment, Cyber stalking, etc. in violation of the

Women's Violence Act, Department of Justice Reauthorization Act of 2005, H.R. 3402, titled "Preventing Cyber stalking" and numbered as § 113, §113(a)(3) provides that Section 223(a)(1)(C) applies to "any device or software that can be used to originate telecommunications or other types of communications that are transmitted, in whole or in part, by the Internet; Cyber-stalking and Cyber-harassment laws in violation of the Communications Act, 47 U.S.C. § 223(a)(1)(C) and § 223(h)(1)(B).

WHEREFORE Plaintiffs' request:

A. An immediate Order enjoining Defendants Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc. and any party on their behalf from disseminating Liberi's Social Security number, date of birth, name, where she lives, etc.;

B. An immediate Order of retraction against Defendants Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc. and any party who has published Liberi's confidential information on their behalves to immediately retract and remove Liberi's private confidential information, including but not limited to her Social Security number, date of birth, where she resides, information about her husband, the false criminal accusations, etc;

C. An immediate Order of retraction against Defendants' Taitz, Defend our Freedoms Foundation, Inc., Sundquist, Rock Salt Publishing, and anyone on their behalf from distributing Lisa Ostella's personal and confidential information, including but not limited to her home address and telephone number;

D. Enjoin Defendant Taitz, Defend our Freedoms, Inc., Yosef and any party operating on their behalf from any further "hacking" of the Plaintiffs' computers;

E. Enter Judgment against the Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., collectively, jointly and separately, for civil penalties in the amount of Four Hundred Thirty-Two Million [\$432,000,000.00] Dollars separately per Defendant to be awarded to Liberi as civil penalties pursuant to the California Privacy Laws, California Civil Code 1798, et sequitur. Pursuant to Taitz' own admission she has a total of Thirty-Six Thousand [36,000] people on her media and individual mail lists, Taitz sent out a minimum of four e-mails with in excess Thirty-Six Thousand [36,000] recipients, including international which is a total of One Hundred Forty-Four Thousand [140,000] e-mails multiplied by Three Thousand Dollars [\$3,000.00] per e-mail, which Plaintiff Liberi is entitled too pursuant to the California privacy laws, California Civil Code 1798 et sequitur;

F. Enter Judgment, collectively, jointly and separately, against the Defendants' for damages in the amount of One Million dollars [\$1,000,000.00] per Defendant to be awarded to Plaintiff Liberi;

G. Enter Judgment, collectively, jointly and separately, against the Defendants' for compensatory damages in the amount of Five Hundred Thousand Dollars [\$500,000.00] per Defendant to be awarded to Plaintiff Liberi;

H. Enter Judgment, collectively, jointly and separately, against the Defendants' for Punitive damages in the amount of Ten Million Dollars [\$10,000,000.00] per Defendant to be awarded to Plaintiff Liberi;

I. Attorney's fees, costs and interest for Plaintiff Liberi; and

J. Such other relief as this Court deems proper.

COUNT TWO

DEFEMATION *Per Se*, SLANDER AND LIBEL

(Against All Defendants)

158. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.
159. Defendants' Taitz, Defend our Freedoms Foundation, Inc., Yosef, Sankey with the Sankey Firm, Sankey Investigations, Inc., Mr. & Mrs. Hale, Plains Radio, Bar H Farms and Linda made false statements about Liberi claiming she had a criminal record for convictions of amongst other things, identity theft, falsification of police reports, falsification of credit reports, falsification of documents, claiming Lisa Liberi and Lisa Ostella were one and the same, falsely claiming Liberi and Ostella were diverting funds from Taitz's PayPal account; falsely claiming Liberi and Ostella were working together; falsely claiming Liberi was diverting funds from Berg and the Law Offices of Philip J. Berg; falsely claiming Liberi was posting on blogs under her aliases; falsely claiming Liberi was committing crimes, falsely claiming Liberi was "trashing" Linda; falsely claiming Liberi was "trashing Taitz", falsely claiming Liberi had to pay Twenty-One Thousand [\$21,000] Dollars per month in restitution, falsely claiming Liberi was convicted of amongst other things, identity theft, falsifying police reports, falsifying credit reports, counterfeiting documents, etc.
160. Defendants' Taitz, Mr. and Mrs. Hale, Plains Radio and Bar H Farms made false statements about Adams claiming she had a criminal record; conning people out of money; calling her horrible names; falsely accusing her of stealing the "Obama" documents; threatening her, etc.

161. Defendants' Taitz, Mr. and Mrs. Hale, Plains Radio, Bar H Farms and Linda made false statements about Berg and the Law Offices of Philip J. Berg claiming he was under federal investigation; he was a shyster; conning money out of innocent people, was only in it for the money, had a criminal working for him, etc.
162. Defendants Taitz, Yosef, Defend our Freedom Foundations, Inc., James Sundquist, Rock Salt Publishing made false statements about Ostella that she hijacked Taitz's website; was working with Liberi; was diverting funds from Taitz PayPal accounts, she hijacked Taitz's websites, filing false police reports with the Orange County Sheriff's Department, the FBI in California and New Jersey, claiming her website and PayPal accounts had been hacked, etc.
163. Defendants' false statements about Plaintiffs were made across the entire internet world; sent to unknown individuals by way of mass e-mailing; telephone conversation; posting on the Defendants websites, etc.
164. At all relevant times, Defendants have acted with actual malice.
165. Defendants' defamatory statements about all Plaintiffs have severely injured the reputation and honorable services provided by each one of them.
166. Defendants' defamatory statements about the Plaintiffs have caused Plaintiffs to suffer mental anguish and impaired their personal and professional reputation and standing in the community.

WHEREFORE Plaintiffs' request:

A. An immediate Order enjoining the Defendants' and all parties acting on their behalf from airing and/or publishing any defamatory or false statements about Plaintiffs, Lisa Liberi, Philip J. Berg, the Law Offices of Philip J. Berg, Evelyn Adams,

Lisa Ostella and Go Excel Global, the Plaintiffs' family members, etc. via the internet or any other print or electronic medium or broadcasts and/or radio, from portraying Plaintiffs in a false light via the internet or another print or electronic medium or broadcasts and/or radio, untrue statements about the Plaintiffs' enjoin the Defendants' from posting and distributing Liberi's Social Security number and personal identifying information; enjoin the Defendants' from any further harassment of the Plaintiffs', enjoin Defendants' from the filing and reporting of falsified criminal activity, etc.;

B. An immediate Order enjoining Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party on their behalf from disseminating Liberi's Social Security number, date of birth, name, where she lives, etc.;

C. An immediate Order of Retraction against Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party who has published Liberi's confidential information on their behalves to immediately retract and remove Liberi's private confidential information, including but not limited to her Social Security number, date of birth, where she resides, information about her husband, the false criminal accusations, etc.;

D. An immediate Order of Retraction against Defendants', Taitz, Defend our Freedoms Foundation, Inc., Sundquist, Rock Salt Publishing, and anyone on their behalf from distributing Lisa Ostella's personal and confidential information, including but not limited to her home address and telephone number;

E Enjoin Defendants, Taitz, Defend our Freedoms, Inc. and Yosef, and any party operating on their behalf from any further "hacking" of the Plaintiffs' computers;

F. Enter Judgment, collectively, jointly and separately, against the Defendants' for damages in the amount of One Million [\$1,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

G. Enter Judgment, collectively, jointly and separately, against the Defendants' for compensatory damages in the amount of Five Hundred Thousand [\$500,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

H. Enter Judgment, collectively, jointly and separately, against the Defendants' for Punitive damages in the amount of Ten Million [\$10,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

I. Attorney's fees, costs and interest for each separate Plaintiff herein; and

J. Such other relief as this Court deems proper.

COUNT THREE

FALSE-LIGHT INVASION OF PRIVACY

(Against all Defendants)

167. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.

168. Defendants' defamatory statements about Plaintiffs' placed Plaintiffs' and their staff in a false-light before the public.

169. The false-light in which Defendants' placed Plaintiffs' and their staff would be highly offensive to a reasonable person.

170. At all times Defendants' knew that their statements were false and/or acted in reckless disregard of whether they were true or false.

171. At all relevant times, Defendants' have acted with actual malice.

172. Defendants' defamatory statements about Plaintiffs' have had a deleterious impact on Plaintiffs' and their businesses because they were forced to expend money to defend against false statements and that they were embarrassed and humiliated.

173. Defendants' false statements about Plaintiffs' and their businesses have severely injured the reputation and honorable services the Plaintiffs, their businesses and their staff were providing.

WHEREFORE Plaintiffs' request:

A. An immediate Order enjoining the Defendants' and all parties acting on their behalf from airing and/or publishing any defamatory or false statements about Plaintiffs, Lisa Liberi, Philip J. Berg, the Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella, the Plaintiffs' family members, etc. via the internet or any other print or electronic medium or broadcasts and/or radio, from portraying Plaintiffs in a false-light via the internet or another print or electronic medium or broadcasts and/or radio, untrue statements about the Plaintiffs'; enjoin the Defendants' from posting and distributing Liberi's Social Security number and personal identifying information; enjoin the Defendants' from any further harassment of the Plaintiffs', enjoin Defendants' from the filing and reporting of falsified criminal activity, etc.;

B. An immediate Order enjoining Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any

party on their behalf from disseminating Liberi's Social Security number, date of birth, name, where she lives, etc.;

C. An immediate Order of Retraction against Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party who has published Liberi's confidential information on their behalves to immediately retract and remove Liberi's private confidential information, including but not limited to her Social Security number, date of birth, where she resides, information about her husband, the false criminal accusations, etc.;

D. An immediate Order of Retraction against Defendants', Taitz, Defend our Freedoms Foundation, Inc., Sundquist and Rock Salt Publishing and anyone on their behalf from distributing Lisa Ostella's personal and confidential information, including but not limited to her home address and telephone number.

E Enjoin Defendants, Taitz, Defend our Freedoms, Inc. and Yosef, and any party operating on their behalf from any further "hacking" of the Plaintiffs' computers;

F. Enter Judgment, collectively, jointly and separately, against the Defendants' for damages in the amount of One Million [\$1,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

G. Enter Judgment, collectively, jointly and separately, against the Defendants' for compensatory damages in the amount of Five Hundred Thousand [\$500,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

H. Enter Judgment, collectively, jointly and separately, against the Defendants' for Punitive damages in the amount of Ten Million [\$10,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

- I. Attorney's fees, costs and interest for each separate Plaintiff herein; and
- J. Such other relief as this Court deems proper.

COUNT FOUR

HARASSMENT

(Against All Defendants)

174. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.
175. Defendants' have engaged in a longstanding and persistent campaign directed to damaging the Plaintiffs, their staff's reputation and business by publishing on the internet a massive volume of false statements and postings and broadcasting across the internet and other channels false and defamatory statements regarding Plaintiffs'.
176. In conjunction with their campaign of internet disparagement, Defendants' have further sent thousands of e-mails and other direct communications and has made numerous phone calls making a variety of falsified statements, accusations about the Plaintiffs' and Plaintiffs businesses and demands upon Plaintiffs' and their businesses.
177. Plaintiffs' and their businesses have been alarmed and felt threatened as a result of the harassment and threats, which they have carried out, by the Defendants'.
178. Despite Plaintiff Adams reasonable efforts to address Defendants', Mr. and Mrs. Hale and Plains Radio, allegations regarding the "Obama" divorce decree, Defendants have persistently demanded additional information and for Plaintiff Berg to turn over his certified set of the "Obama" divorce decree and demanding Plaintiff Adams to

turn over Berg's certified set of his "Obama" divorce decree, Defendants Edgar (Ed) and Caren Hale would go away.

179. Defendants have engaged in unreasonable and outrageous conduct directed to harming the Plaintiffs' and their businesses unjustifiably and to coercing them to accede to the Defendants demands.

180. Defendants have acted unlawfully and in violation of 18 U.S. C. §875(d), 47 U.S.C. §223(a), et al, Texas Penal Code §42.07; the Women's Violence Act, Department of Justice Reauthorization Act of 2005, H.R. 3402, titled "Preventing Cyber-stalking" and numbered as § 113, § 113(a)(3) provides that Section 223(a)(1)(C) applies to "any device or software that can be used to originate telecommunications or other types of communications that are transmitted, in whole or in part, by the internet; Cyber-stalking and Cyber-harassment laws in violation of the Communications Act, 47 U.S.C. § 223(a)(1)(C) and § 223(h)(1)(B).

181. Plaintiffs' and their businesses have suffered losses and damages as a result of the Defendants harassment.

WHEREFORE Plaintiffs' request:

A. An immediate Order enjoining the Defendants' and all parties acting on their behalf from airing and/or publishing any defamatory or false statements about Plaintiffs, Lisa Liberi, Philip J. Berg, the Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella, the Plaintiffs' family members, etc. via the internet or any other print or electronic medium or broadcasts and/or radio, from portraying Plaintiffs in a false-light via the internet or another print or electronic medium or broadcasts and/or radio, untrue statements about the Plaintiffs' enjoin the Defendants' from posting and distributing

Liberi's Social Security number and personal identifying information; enjoin the Defendants' from any further harassment of the Plaintiffs', enjoin Defendants' from the filing and reporting of falsified criminal activity, etc.;

B. An immediate Order enjoining Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party on their behalf from disseminating Liberi's Social Security number, date of birth, name, where she lives, etc.;

C. An immediate Order of Retraction against Defendants Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations and any party who has published Liberi's confidential information on their behalves to immediately retract and remove Liberi's private confidential information, including but not limited to her Social Security number, date of birth, where she resides, information about her husband, the false criminal accusations, etc.;

D. An immediate Order of Retraction against Defendants', Taitz, Defend our Freedoms Foundation, Inc., Sundquist and Rock Salt Publishing, and anyone on their behalf from distributing Lisa Ostella's personal and confidential information, including but not limited to her home address and telephone number;

E Enjoin Defendants, Taitz, Defend our Freedoms, Inc. and Yosef, and any party operating on their behalf from any further "hacking" of the Plaintiffs' computers;

F. Enter Judgment, collectively, jointly and separately, against the Defendants' for damages in the amount of One Million [\$1,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

G. Enter Judgment, collectively, jointly and separately, against the Defendants' for compensatory damages in the amount of Five Hundred Thousand

[\$500,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

H. Enter Judgment, collectively, jointly and separately, against the Defendants' for Punitive damages in the amount of Ten Million [\$10,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

I. Attorney's fees, costs and interest for each separate Plaintiff herein; and

J. Such other relief as this Court deems proper.

COUNT FIVE

FALSE DESIGNATIONS AND DESCRIPTIONS OF FACTS

(Against all Defendants)

182. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.

183. Plaintiffs' and their businesses have invested considerable effort and expense in establishing goodwill in their names and in promoting their careers and professional reputation. Liberi in promoting her profession as a skillful and highly competent Legal Assistant and Paralegal; Berg in promoting his profession as skillful and highly competent provider as a prominent attorney with a professional staff and law firm; Adams in promoting her profession as a skillful and highly competent radio host/broadcaster; and Ostella and Go Excel Global in promoting her profession as a skillful and highly competent Webmaster and a Website Hosting Company.

184. Defendants have published on the internet numerous statements in conjunction with false and misleading designations and false and misleading descriptions and representations of fact.

185. Defendants' false and misleading statements about the Plaintiffs' and their businesses are likely to cause and have caused public confusion regarding their associations, intents and purposes. Those false and misleading statements further have grossly misrepresented the nature, characteristics and quality of the Plaintiffs' and their businesses services.

186. Defendants' false and misleading statements about Plaintiffs' and their businesses have been designed to tarnish and have tarnished the Plaintiffs' and their businesses names, reputation and business.

187. On information and belief, Defendants' have acted with an intent and design to achieve publicity, fame and notoriety for themselves and thereby enhance the market for the Defendants' regarding the Obama lawsuits.

188. The Defendants' false and misleading statements about Plaintiffs' and their businesses have been designed to harm and have harmed Plaintiffs', and their businesses and have caused losses and damages to the Plaintiffs' and their businesses.

189. Defendants' have engaged in unlawful conduct in violation of 15 U.S.C. §1125, False designations of origin, false descriptions, and dilution forbidden.

WHEREFORE Plaintiffs' request:

A. An immediate Order enjoining the Defendants' and all parties acting on their behalf from airing and/or publishing any defamatory or false statements about Plaintiffs, Lisa Liberi, Philip J. Berg, the Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella, the Plaintiffs' family members, etc., via the internet or any other print or electronic medium or broadcasts and/or radio, from portraying Plaintiffs in a false-light via the internet or another print or electronic medium or broadcasts and/or radio, untrue

statements about the Plaintiffs', enjoin the Defendants' from posting and distributing Liberi's social security number and personal identifying information; enjoin the Defendants' from any further harassment of the Plaintiffs', enjoin Defendants' from the filing and reporting of falsified criminal activity, etc.;

B. An immediate Order enjoining Defendants Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party on their behalf from disseminating Liberi's Social Security number, date of birth, name, where she lives, etc.;

C. An immediate Order of Retraction against Defendants Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party who has published Liberi's confidential information on their behalves to immediately retract and remove Liberi's private confidential information, including but not limited to her Social Security number, date of birth, where she resides, information about her husband, the false criminal accusations, etc.;

D. An immediate Order of Retraction against Defendants', Taitz, Defend our Freedoms Foundation, Inc., Sundquist and Rock Salt Publishing, and anyone on their behalf from distributing Lisa Ostella's personal and confidential information, including but not limited to her home address and telephone number;

E Enjoin Defendants, Taitz, Defend our Freedoms, Inc. and Yosef, and any party operating on their behalf from any further "hacking" of the Plaintiffs' computers;

F. Enter Judgment, collectively, jointly and separately, against the Defendants' for damages in the amount of One Million [\$1,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

G. Enter Judgment, collectively, jointly and separately, against the Defendants' for compensatory damages in the amount of Five Hundred Thousand [\$500,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

H. Enter Judgment, collectively, jointly and separately, against the Defendants' for Punitive damages in the amount of Ten Million [\$10,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

I. Attorney's fees, costs and interest for each separate Plaintiff herein; and

J. Such other relief as this Court deems proper.

COUNT SIX

INJUNCTIVE RELIEF

(Against All Defendants)

190. Plaintiffs incorporate by reference all of the foregoing allegations as if set forth herein at length.

191. The Defendants' defamatory statements about Plaintiffs' and their businesses have damaged Plaintiffs' and their businesses reputation as well as Liberi's effective and skillful law experience; Berg's law practice, Adams Radio Shows and Ostella's Web Mastering and Web Hosting Company, Go Excel Global with false allegations, misrepresentations of their character and publicity that placed them in false-light. Such intentional and recklessly made statements have caused Plaintiffs, their staff and their businesses irreparable harm for which there is no adequate remedy at law.

192. As a direct and proximate result of the Defendants' defamatory statements, the Plaintiffs' and their businesses have lost present and future business opportunities,

has suffered and will suffer, irreparable harm to their reputation and standing in the legal, radio, webmaster and web hosting communities, and have suffered and will suffer restrictions on their ability to pursue support for future endeavors for which there is no adequate remedy at law.

193. Plaintiffs' will likely succeed on the merits of its underlying case.

194. The injunctive relief sought will not adversely affect the publics' interests.

195. As a direct and proximate result of the Defendants illicit actions, Plaintiffs' and their businesses are entitled to an injunction against the Defendants'.

196. It has been necessary for the Plaintiffs' to retain the services of an attorney to obtain redress, and Plaintiffs are entitled to reasonable attorney fees and costs therefore.

WHEREFORE Plaintiffs' request:

A. . An immediate Order enjoining the Defendants' and all parties acting on their behalf from airing and/or publishing any defamatory or false statements about Plaintiffs, Lisa Liberi, Philip J. Berg, the Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella, the Plaintiffs' family members, etc. via the internet or any other print or electronic medium or broadcasts and/or radio, from portraying Plaintiffs in a false-light via the internet or another print or electronic medium or broadcasts and/or radio, untrue statements about the Plaintiffs' enjoin the Defendants' from posting and distributing Liberi's Social Security number and personal identifying information; enjoin the Defendants' from any further harassment of the Plaintiffs', enjoin Defendants' from the filing and reporting of falsified criminal activity, etc.;

B. An immediate Order enjoining Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party on their behalf from disseminating Liberi's Social Security number, date of birth, name, where she lives, etc.;

C. An immediate Order of Retraction against Defendants, Taitz, Defend our Freedoms Foundation, Inc., Neil Sankey, the Sankey Firm and Sankey Investigations, Inc., and any party who has published Liberi's confidential information on their behalves to immediately retract and remove Liberi's private confidential information, including but not limited to her Social Security number, date of birth, where she resides, information about her husband, the false criminal accusations, etc.;

D. An immediate Order of Retraction against Defendants', Taitz, Defend our Freedoms Foundation, Inc., Sundquist and Rock Salt Publishing, and anyone on their behalf from distributing Lisa Ostella's personal and confidential information, including but not limited to her home address and telephone number;

E Enjoin Defendants, Taitz, Defend our Freedoms, Inc. and Yosef, and any party operating on their behalf from any further "hacking" of the Plaintiffs' computers;

F. Enter Judgment, collectively, jointly and separately, against the Defendants' for damages in the amount of One Million [\$1,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

G. Enter Judgment, collectively, jointly and separately, against the Defendants' for compensatory damages in the amount of Five Hundred Thousand [\$500,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

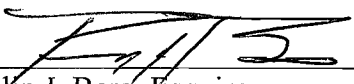
H. Enter Judgment, collectively, jointly and separately, against the Defendants' for Punitive damages in the amount of Ten Million [\$10,000,000.00] Dollars per Defendant to be awarded to each and every separate Plaintiff herein;

I. Attorney's fees, costs and interest for each separate Plaintiff herein; and

J. Such other relief as this Court deems proper.

Date: May 04, 2009

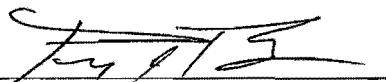
Respectfully submitted,


Philip J. Berg, Esquire
Attorney for Plaintiffs

VERIFICATION

I, Philip J. Berg, Esquire, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 and the laws of the United States relating to unsworn falsification to authorities.

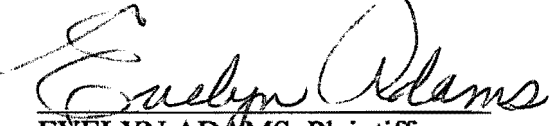
Dated: May 4, 2009


PHILIP J. BERG, ESQUIRE,
Plaintiff

VERIFICATION

I, Evelyn Adams, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing .Complaint are true and correct to the best of my Knowledge, information and belief. The undersigned understands that the statements therein ~~are made subject to the penalties of 18 Pa. C.S. Section 4904 and the laws of the~~ United States relating to unsworn falsification to authorities.

Dated: April 25, 2009


EVELYN ADAMS, Plaintiff

VERIFICATION

I, Lisa M. Ostella, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing .Complaint are true and correct to the best of my Knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 and the laws of the United States relating to unsworn falsification to authorities.

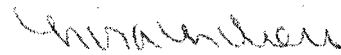
Dated: April 25, 2009


LISA M. OSTELLA, Plaintiff

VERIFICATION

I, Lisa Liberi, hereby state that I am a Plaintiff in this action and verify that the statements made in the foregoing .Complaint are true and correct to the best of my Knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 and the laws of the United States relating to unsworn falsification to authorities.

Dated: April 25, 2009



LISA LIBERI, Plaintiff